DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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Postal Rate and Fee Changes, 1997	Docket No. R97-1

NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
U.S. POSTAL SERVICE WITNESS
ANTOINETTE CROWDER (NAA/JP-NOI3-1-2)
February 12, 1998

The Newspaper Association of America hereby submits the attached interrogatories to Joint Parties witness Antoinette Crowder (JP-NOI3), and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

By: _____
William B. Baker
Alan R. Jenkins

Robert J. Brinkmann
NEWSPAPER ASSOCIATION OF AMERICA
529 14th Street, N.W.
Suite 440
Washington, D.C.
(202) 638-4792

WILEY, REIN & FIELDING
1776 K Street, N.W.
Washington, DC 20006-2304
(202) 429-7255

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

_____
Alan R. Jenkins

February 12, 1998

NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
U.S. POSTAL SERVICE WITNESS
ANTOINETTE CROWDER (NAA/JP-NOI3-1-2)

NAA/JP-NOI3-1. Please refer to page 8, lines 19-10 of your testimony where you state: "All non-elemental load time should be considered variable to the same extent as stops coverage."

(a) Assume the Commission chooses to employ its single subclass stop method to attribute the access costs of stops receiving only one subclass of mail to that subclass. Setting aside the fact that you may disagree with that assumption or methodology, if the Commission chooses to use its single subclass stop method to attribute access and coverage-related load costs, would the non-elemental load time be included in the coverage-related load time that the Commission attributes in this manner? If not, please explain why not.

(b) Are the non-elemental load costs for the stops receiving a single subclass of mail part of the incremental costs of that subclass? If not, why not?

NAA/JP-NOI3-2. Please refer to page 10, lines 10-13 of your testimony where you state: "It can easily be demonstrated that elemental load time already includes the indirect effect of volume on stop load time caused by changes in the number of actual deliveries per stop."

(a) If the number of actual deliveries per stop increases with no change in the volume of mail for the stop, will load time increase? Please explain why or why not. Please provide an example to demonstrate your conclusion.

(b) Does your proposed model reflect the increases in load time associated with increases in the number of deliveries per stop independent of any volume increase? If so, please explain how. If no, please explain why not.